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March 17, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

VIA HAND DELIVERY

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: PP Docket No. 93-253 -- Delay of the C Block Auctions Eliminates
Any Real Opportunity for Women to Participate in PCS

Dear Mr. Caton:

As a result of the D.C. Circuit's order staying the C block auctions, qualified women-owned businesses are faced with a loss of one of the only realistic opportunities to participate in the communications industry -- PCS. In structuring its competitive bidding rules, the Commission appropriately recognized, based on the record, that women are extremely under-represented in the communications industry. Auctions further increase the likelihood of continued under-representation of women in the industry because of the barriers to capital faced by women.

Unfortunately, discrimination against women is alive and well. Significantly, on the same day of the Court's order a report released by the Federal Glass Ceiling Commission documented the continued under-representation of women in corporate management positions. The study revealed that only 5% of the top management positions at Fortune 2000 industry and service companies are held by women.¹ In the utility industry, women were found to hold only 20% of the managerial positions. These statistics demonstrate once again the continued barriers faced by women in reaching senior management positions in large companies and the barriers women face in capital-intensive industries such as the utility industry.

¹ See *Glass Ceiling Firmly In Place, Panel Finds*, Wash. Post, March 16, 1995 at A.1.
(A copy of the article is attached.)

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Pursuant to the directive of Congress, the FCC developed competitive bidding rules for the entrepreneurs block that appropriately balance the need to create incentives for women to participate in PCS and fulfill Congress' mandate for a wide dissemination of licenses. The FCC's rules create ample opportunity for all bidders large and small. A delay of the auctions imposes a possibly insurmountable obstacle in the path of women-owned businesses seeking to bid for PCS licenses and to enter the communications industry. The uncertainty injected by the delay will frighten off investors that women-owned businesses have worked hard to enlist, will increase the competitive advantage the A&B block winners have over all designated entities **including women-owned businesses** and will decrease the likely level of competition in the communications industry.

AWRT stands ready to work with the Commission to reach a solution that will help preserve the opportunity for women to participate in PCS and to get the auctions back on track.

Respectfully submitted,

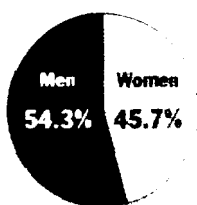

Shelley L. Spence
Vice President, Government Relations

Attachment

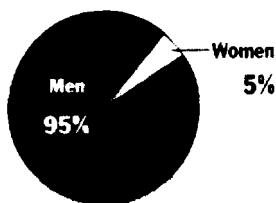
cc: Chairman Reed E. Hundt
Commissioner James H. Quello
Commissioner Andrew C. Barrett
Commissioner Rachelle B. Chong
Commissioner Susan Ness
Anthony L. Williams
Catherine J.K. Sandoval

'Glass Ceiling' Firmly In Place, Panel Finds

While women make up almost 46 percent of the U.S. work force



... they represent only 5 percent of top management at Fortune 2000 industrial and service firms.



Minorities, Women Are Rare In Management

By Frank Swoboda
Washington Post Staff Writer

Efforts to shatter the "glass ceiling" that blocks women and minorities from the upper levels of corporate management are "disappointingly slow" even though most corporate chief executives say they believe the problem has been solved for women, according to the report of a bipartisan commission issued yesterday.

The Glass Ceiling Commission, which spent three years studying the issue, noted that 97 percent of senior managers at the Fortune 1000 industrial corporations are white males, and only 5 percent of the top managers at Fortune 2000 industrial and service companies are women, virtually all of them white. Two-thirds of the overall population and 57 percent of the work force is female or a minority, or both.

"Before one can even look at the glass ceiling, one must get through the front door and into the building," the report said. "The fact is large numbers of minorities and women of all races and ethnicities are nowhere near the front door of Corporate America." The report said members of all minority groups are still "disproportionately represented" among the working poor.

The commission said that corporate chief executives said they thought the problem had been taken care of. "The overwhelming majority of CEOs interviewed ... think of the glass ceiling as something that used to affect women—white and non-white—but that is no longer a real problem for them," the report said.

"The world at the top of the corporate hierarchy still does not look anything like America," said Labor Secretary Robert B. Reich, who is chairman of the commission. Reich called the commission's findings "troubling, to say the least."

The commission's report comes as leading congressional Republicans—as well as some Democratic lawmakers—question whether the need for affirmative action in hiring and promotions has passed. President Clinton has ordered a review of all federal affirmative action programs.

The commission, the first ma-

Bipartisan Panel Concludes 'Glass Ceiling' Unshattered

GLASS CEILING, From A1

for government effort to break the glass ceiling, was launched by the Bush administration. Then-Labor Secretary Elizabeth Hanford Dole initiated the first government studies of the issue, targeting federal contractors regulated by her department.

Her husband, Senate Republican leader Robert J. Dole (Kan.), who as majority leader is now calling for a re-assessment of affirmative action, pushed for the creation of the commission as part of the Civil Rights Act of 1991. At the time, Labor Department officials described the government's glass ceiling initiative as a "natural progression" in the evolution of women in the workplace.

A spokesman for the senator's office said he would not comment on the report until he had read it.

Reich called the senator a "guiding light" for the report and proof that the push for affirmative action does not have to be partisan. Privately, however, Clinton administration officials said they did not expect the commission's recommendations for government action, which are due by No-

vember, to be embraced by the Republican-controlled Congress.

The 21-member commission is made up of lawmakers, corporate executives and representatives of public interest groups appointed by Congress and the Bush administration. Reich is chairman because he is the current labor secretary.

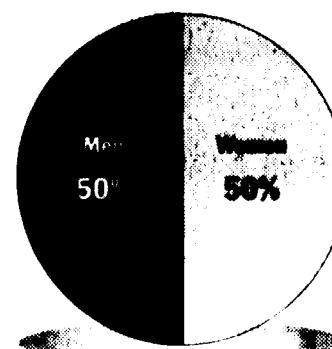
The commission said its research revealed three levels of "artificial barriers" to the advancement of minorities and women in corporate management that contradict "this nation's ethic of individual worth and accountability—the belief that education, training, dedication and hard work will lead to a better life." The three levels are:

- Societal barriers that may be outside the control of business, such as restrictions on the supply of qualified women and minorities as the result of the nation's education system. The commission also pointed to what it called the "difference barrier," in which society stereotypes people according to gender, race or ethnicity.
- Internal structural barriers that are in the direct control of business, such as recruitment policies and corporate

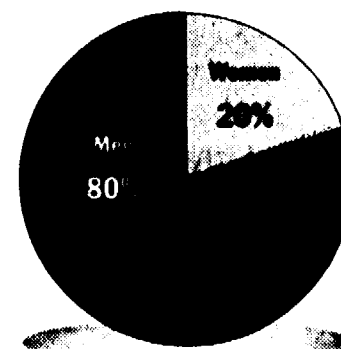
THE BEST AND THE WORST

An examination of executives and managers within industries shows that the insurance business is the most equitable, while in the utilities industry less than 20 percent of managers are women.

INSURANCE



UTILITIES



SOURCE: Census Bureau, Glass Ceiling Commission

THE WALL STREET JOURNAL

cultures that alienate and isolate women and minorities and cluster them in jobs that are not on a career track to the top.

■ Governmental barriers, such as a lack of vigorous monitoring and law enforcement in the employment area as well as weaknesses in the data collected by the government to help identify problem areas.

The commission said it found workers tend to be clustered in industries

on the basis of sex more than race. Nearly 75 percent of working women, for example, are employed in service industries such as finance, insurance and real estate and the wholesale and retail trades, the study said.

Another potential barrier to advancement is the trend toward corporate downsizing that has taken place over the last decade, which tends to limit opportunities for all managers, the commission said.